

LEFV/EJS:ks  
97-1

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
MIAMI DIVISION

CASE NO. 00-6022-CIV-LENARD  
Magistrate Judge Turnoff

NIGHT BOX  
FILED

OCT 16 2001

CLARENCE A. BODOX  
CLERK, USDC / SDFL / MIA

HENRY NARANJO and  
MARLENE RAMIREZ,

Plaintiffs,

v.

STEPHEN BYRON SMITH, and  
PALMER JOHNSON, INC.,

Defendants.

\_\_\_\_\_  
PALMER JOHNSON, INC.,

Third Party Plaintiff,

v.

TOM FEXAS YACHT DESIGN, INC.,

Defendant.

**PALMER JOHNSON'S OBJECTION TO TOM FEXAS' FIRST SET OF  
INTERROGATORIES AND FIRST REQUEST TO PRODUCE**

COMES NOW, the Defendant, Palmer Johnson, by and through its undersigned attorneys, and file this its Objection to Tom Fexas' First Set of Interrogatories dated September 13, 2001, and First Request to Produce dated September 15, 2001, in the above captioned matter, and in support thereof states as follows:

1. That the First Set of Interrogatories and First Request to Produce filed by the Third Party Defendant, Tom Fexas, were served outside of the expert and fact discovery

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time parameters as found in this Court's latest orders, which set the fact discovery deadline at August 20, 2001, and the expert discovery deadline at August 30, 2001.

WHEREFORE the Defendant respectfully requests that this Court enter an order sustaining the aforementioned objection.

**CERTIFICATE OF SERVICE**

WE HEREBY CERTIFY that a true and correct copy of the foregoing motion has been furnished by mail this **16th** day of October, 2001 to: **Manuel Valdes, Esquire**, Law Offices of Manuel Valdes, Attorneys for Plaintiffs, 910 Madrid Street, Coral Gables, Florida 33134; **F. David Famulari, Esquire**, Co-Counsel for Plaintiffs, Blanck & Perry, P.A., 5730 SW 74th St., Suite 700, Miami, FL 33143; **John D. Kallen, Esquire**, Badiak, Will & Kallen, Attorneys for Stephen Byron Smith, 17071 West Dixie Highway, North Miami Beach, Florida 33160; **Joseph L. Mannikko, Esquire**, Mannikko & Baris, P.A., 870 SW Martin Downs Blvd., Suite 1, Palm City, Florida 34990, and **David L. Weber, Esquire**, Pinkert Law Firm LLP, 454 Kentucky Street, P.O. Box 89, Sturgeon Bay, WI 54235-0089.

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